

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

TRICIA CAMPO, individually and on behalf	:	
of all others similarly situated,	:	
Plaintiff,	:	
	:	
v.	:	Docket No. 1:20-cv-00925 (AJT/IDD)
	:	
THS GROUP, LLC, d/b/a Total Home	:	
Protection,	:	
Defendant.	:	

RENEWED STIPULATION TO REVISE SCHEDULING ORDER

Plaintiff Tricia Campo (“Plaintiff” or “Campo”) and Defendant THS Group, LLC (“Defendant” or “THS”), through their counsel, stipulate as follows:

Plaintiff and Defendant filed a Stipulation to Revise Scheduling Order on January 21, 2021. (Dkt. 26.) On March 5, 2021, the Court denied the stipulation without prejudice. (Dkt. 29.) The Court’s Order stated that the requests regarding a class certification briefing schedule would be addressed in a separate order by the District Judge. (*See* Dkt. 26.)

The Parties now renew their request for an extension of the discovery deadline to May 12, 2021. The additional time will permit the Parties sufficient time to complete discovery and brief class certification on a fulsome record.

The proposed extension is made for good cause and is not sought for an improper purpose. Plaintiff served discovery requests on December 2, 2020, nine (9) days after the Rule 16(b) Scheduling Order was entered. Defendant responded to the discovery requests on January 28, 2021. Just days later, on February 1, 2021, Plaintiff sent Defendant a discovery dispute letter, which Defendant responded to on February 8, 2021. Unable to resolve the dispute informally,

Plaintiff moved to compel on February 17, 2021. (Dkt. 27.) The hearing on the motion to compel is scheduled for March 12, 2021.

Thus, the need for additional time to complete discovery is not due to lack of diligence. The additional time will permit the Court to resolve the discovery dispute and allow the parties to gather the necessary written discovery they require, and also to schedule and take depositions after the appropriate documents have been produced.

Respectfully submitted this 5th day of March, 2021.

/s/ Francis J. Driscoll, Jr.

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